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**UNITED STATES OF AMERICA
Before the
Securities and Exchange Commission**



**ADMINISTRATIVE PROCEEDING
File No. 3-16427**

In the Matter of

Robert J. Lunn

Respondent

RESPONDENT'S MOTION FOR LEAVE TO FILE ANSWER INSTANTER

NOW COMES Respondent Robert J. Lunn, by his attorney John M. Beal, and moves that he be given leave to file instanter his Respondent's Answer to Motion for Summary Judgment, and in support thereof states as follows:

1. Respondent's Answer was due to be filed on June 3, 2015.
2. The preparation of the Answer was delayed due other unavoidable deadlines in matters of counsel, most particularly preparation for an *en banc* argument that took place before the Seventh Circuit Court of Appeals on June 3, 2015, in *United States v. Paul Davis, et al.*, 14-1124, in which case counsel represented appellee Alfred Withers.
3. The Answer has been completed and is being submitted by fax on June 4, 2015, with paper copies being sent by overnight mail.
4. There would be no prejudice to the Commission from the delay in the filing of the Answer.
5. Enclosed with this motion is the executed Answer and three copies.

WHEREFORE Respondent Robert J. Lunn moves for leave to file instanter his Answer and that the enclosed Answer and three copies be

accepted as that filing.

Respectfully submitted,



John M. Beal
Attorney for Respondent

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